

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC.,  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION,

Case No. 19-md-02913-WHO

**JOINT STIPULATION AND [PROPOSED]  
ORDER REGARDING FURTHER  
EXTENSION OF TIME FOR FILING  
JOINT SUBMISSION ADDRESSING  
ADMINISTRATIVE MOTIONS TO SEAL  
FILED IN CONNECTION WITH  
MOTIONS FOR SUMMARY JUDGMENT,  
MOTIONS IN LIMINE, & MOTIONS RE  
SFUSD TRIAL**

This Document Relates to:

ALL ACTIONS

The undersigned parties jointly stipulate and agree, subject to the Court's approval, to a forty-five (45) day extension of the deadline for the parties to submit a joint chart addressing all material covered by the administration motions identified by this Court in its September 13, 2024 Order Regarding Administrative Motions To Seal Filed In Connection With Motions For Summary Judgment, Motions In Limine, & Motions Re *SFUSD* Trial (ECF No. 4299). In support thereof, the parties state as follows:

WHEREAS, on September 13, 2024, the Court entered an order identifying administrative motions to seal files in connection with the *San Francisco Unified School District* bellwether case and trial and ordered the parties to submit, within 20 days of entry of the Order<sup>1</sup>, a joint chart identifying the documents – by docket number and exhibit – that contains information not publicly disclosed during the *SFUSD* trial that continue to meet the compelling justification standard for sealing and which documents may be unsealed (ECF No. 4299);

WHEREAS, on October 1, 2024, this Court granted the Parties' Joint Stipulation Regarding Extension of Time For Filing Joint Submission Addressing Administrative Motions to Seal Filed

<sup>1</sup> Twenty days from entry of the Court's September 13, 2024, sets forth a deadline of October 3, 2024.

1 in Connection With Motions For Summary Judgment, Motions In Limine, & Motions Re *SFUSD*  
2 Trial, extending the deadline to submit a joint chart to November 4, 2024 (ECF No. 4324);

3 WHEREAS, on October 29, 2024, this Court granted the Parties' Joint Stipulation  
4 Regarding Further Extension of Time For Filing Joint Submission Addressing Administrative  
5 Motions to Seal Filed in Connection With Motions For Summary Judgment, Motions In Limine, &  
6 Motions Re *SFUSD* Trial, extending the deadline to submit a joint chart to December 4, 2024 (ECF  
7 No. 4330);

8 WHEREAS, the Parties continue to diligently work to review each motion and related  
9 documents filed under seal<sup>2</sup>, review the *SFUSD* trial transcript for the documents' disclosure as  
10 well as additional sources and actions wherein documents may have been disclosed, and identify  
11 whether the documents continue to require sealing for compelling justification;

12 WHEREAS, the Parties believe additional time is required to ensure each document is  
13 properly reviewed and analyzed for confidentiality considerations and they believe that extending  
14 the deadline to January 17, 2025<sup>3</sup>, would provide time for more thorough analysis for the Court's  
15 subsequent consideration;

16 WHEREAS, the above referenced modifications would not otherwise impact this Court's  
17 administration of the Multi-District Litigation, which remains active;

18 NOW THEREFORE, the parties, through their undersigned counsel, hereby jointly  
19 stipulate, agree and respectfully request that the Court enter an Order further extending the deadline  
20 for parties' joint chart submission regarding administration motions filed in connection with  
21 motions for summary judgment, motions in limine, & motions regarding the *SFUSD* trial to January  
22 17, 2025.

23 RESPECTFULLY SUBMITTED this 30th day of November 2024.  
24  
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27 <sup>2</sup> The Court's September 13, 2024 Order affects 58 motions filed by six parties, and in sum  
implicates over 300 original exhibits, 76 depositions, and 26 expert reports.

28 <sup>3</sup> Because 45 days from December 4, 2024 is Saturday, January 18, 2025, the Parties propose a  
deadline one day before, on January 17, 2025.

By: /s/ Timothy S. Danninger  
 Timothy S. Danninger (*pro hac vice*)  
**GUNSTER YOAKLEY & STEWART,**  
**P.A.**  
 1 Independent Drive, Suite 2300  
 Jacksonville, 32204  
 Telephone: (904) 354-1980

*Attorneys for Defendant Juul Labs, Inc.*

By: /s/ David E. Kouba  
 David E. Kouba, (*pro hac vice*)  
**ARNOLD & PORTER KAY SCHOLER,**  
**LLP**  
 601 Massachusetts Ave, NW  
 Washington, DC 20001  
 Tel: (202) 942-5230  
 Fax: (202) 942-5999  
 david.kouba@arnoldporter.com

*Attorneys for Defendants Altria Group, Inc.,  
 Philip Morris USA Inc., Altria Client Services  
 LLC, and Altria Distribution Company*

By: /s/ Eugene Illovsky  
 Eugene Illovsky  
 Kevin Calia  
**ILLOVSKY GATES & CALIA LLP**  
 1611 Telegraph Ave., Suite 806  
 Oakland, CA 94612  
 Telephone: (415) 500-6643

*Attorneys for Defendant Adam Bowen*

By: /s/ Michael J. Guzman  
**KELLOGG, HANSEN, TODD, FIGEL &  
 FREDERICK, P.L.L.C.**  
 Mark C. Hansen  
 Michael J. Guzman  
 David L. Schwarz  
 Sumner Square, 1615 M St., N.W., Suite 400  
 Washington, DC 20036  
 Telephone: (202) 326-7910

*Attorneys for Defendants Nicholas Pritzker,  
 Riaz Valani, and Hoyoung Huh*

By: /s/ Sarah R. London  
 Sarah R. London  
**LIEFF CABRASER HEIMANN &  
 BERNSTEIN**  
 275 Battery Street, Fl. 29  
 San Francisco, CA 94111  
 Telephone: (415) 956-1000

By: /s/ Dena C. Sharp  
 Dena C. Sharp  
**GIRARD SHARP LLP**  
 601 California St., Suite 1400  
 San Francisco, CA 94108  
 Telephone: (415) 981-4800

By: /s/ Dean Kawamoto  
 Dean Kawamoto  
**KELLER ROHRBACK L.L.P.**  
 1201 Third Ave., Ste. 3200  
 Seattle, WA 98101  
 Telephone: (206) 623-1900

By: /s/ Ellen Relkin  
 Ellen Relkin  
**WEITZ & LUXENBERG**  
 700 Broadway  
 New York, NY 10003  
 Telephone: (212) 558-5500

*Co-Lead Counsel for Plaintiffs*

By: /s/ James Kramer  
 James Kramer  
 Catherine Malone  
 Kevin Askew  
**ORRICK HERRINGTON & SUTCLIFFE  
 LLP**  
 The Orrick Building  
 405 Howard Street  
 San Francisco, CA 94105-2669  
 Telephone: (415) 773-5700  
 jkramer@orrick.com  
 cmalone@orrick.com  
 kaskew@orrick.com

*Attorneys for Defendant James Monsees*

**PROPOSED ORDER**

**PURSUANT TO STIPULATION AND GOOD CAUSE SHOWING, IT IS HEREBY  
ORDERED:**

The deadline for joint chart submission regarding administration motions filed in connection with motions for summary judgment, motions in limine, & motions regarding the *SFUSD* trial that is currently due on December 4, 2024 shall be extended to January 17, 2025.

Date: \_\_\_\_\_, 2024

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HONORABLE WILLIAM H. ORRICK  
United States District Judge